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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**DECLARATION OF JESSICA LIOU IN
SUPPORT OF *EX PARTE* MOTION OF
DEBTORS PURSUANT TO B.L.R. 9006-1
REQUESTING ORDER SHORTENING TIME
FOR HEARING ON DEBTORS' MOTION
PURSUANT TO 11 U.S.C. §§ 363(b) AND 105(a)
AND FED. R. BANKR. P. 6004 AND 9019 FOR
ENTRY OF AN ORDER (I) AUTHORIZING
THE DEBTORS TO SETTLE THE CLAIMS
OF TUBBS PREFERENCE CLAIMANTS AND
(II) GRANTING RELATED RELIEF**

[No Hearing Requested]

Related Document: Dkt. 5287

1 I, Jessica Liou, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am a partner at Weil, Gotshal & Manges LLP, attorneys for PG&E Corporation and
5 Pacific Gas and Electric Company, as debtors and debtors in possession (collectively, “PG&E” or
6 the “Debtors”).

7 2. I submit this Declaration in support of the *Ex Parte Motion of Debtors Pursuant To*
8 *B.L.R. 9006-1 Requesting Order Shortening Time for Hearing on Debtors’ Motion Pursuant to 11*
9 *U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (i)*
10 *Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (ii) Granting Related*
11 *Relief* (the “**Motion to Shorten**”), filed contemporaneously herewith.¹ Except as otherwise indicated
12 herein, the facts set forth in this Declaration are based upon my personal knowledge, information
13 provided to me by the Debtors’ employees, or my opinion based upon my knowledge and experience.
14 I am authorized to submit this Declaration on behalf of the Debtors.

15 3. In the Motion to Shorten, the Debtors request that the Tubbs Settlement Motion be
16 heard on an expedited basis at 10:00 a.m. (prevailing Pacific Time) on January 21, 2020, and that any
17 responses or objections to the Tubbs Settlement Motion be in writing and filed with the Court and
18 served by 4:00 p.m. (prevailing Pacific Time) on January 15, 2020.

19 4. A hearing on January 21, 2020, was already scheduled on the Court’s calendar in these
20 Chapter 11 Cases, with other matters already set for hearing involving the major constituencies.

21 5. Prompt approval of the Tubbs Settlements as provided in the Tort Claimants RSA will
22 allow the Debtors to expedite the plan confirmation timeline, their successful emergence from chapter
23 11, and distributions to fire victims.

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26 ¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the *Debtors’*
27 *Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(b) and Fed. R. Bankr. P. 6004 and 9019 for Entry*
28 *of an Order (i) Authorizing the Debtors to Settle the Claims of Tubbs Preference Claimants and (ii)*
Granting Related Relief (the “**Tubbs Settlement Motion**”) or the Motion to Shorten, as applicable.

1 6. Shortening time for a hearing on the Tubbs Settlement Motion will also save the
2 Debtors and their estates significant time and attorneys' fees that would otherwise be devoted to
3 preparing for the contingency of a Tubbs jury trial, and allow the Debtors and their professionals to
4 turn their full efforts toward expeditiously confirming the Debtors' Amended Plan.

5 7. The Debtors previewed the relief requested in the Motion to Shorten with the TCC and
6 the TCC consents to the relief sought therein. The Debtors also sought consent from the U.S. Trustee
7 and Creditors Committee to the relief requested in the Motion to Shorten, however, the U.S. Trustee
8 and Creditors Committee have not yet provided their consent.

9 8. Given the exigencies and the sensitivities concerning the relief requested in the Tubbs
10 Settlement Motion, it was not feasible to seek consent from other parties prior to the filing of the
11 Motion to Shorten. However, cause exists to hear the Tubbs Settlement Motion on shortened time, as
12 described therein, in the Motion to Shorten, and in the related filings.

1 I declare under penalty of perjury that, to the best of my knowledge and after reasonable
2 inquiry, the foregoing is true and correct and that this Declaration was executed in New York, NY, on
3 January 6, 2020.

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5 /s/ Jessica Liou

6 Jessica Liou
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